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1 2 3 4 5 6	HEATHER E. WILLIAMS, #122664 Federal Defender NOA E. OREN, #297100 Assistant Federal Defender Designated Counsel for Service 801 I Street, 3rd Floor Sacramento, California 95814 Telephone: (916) 498-5700/Facsimile: (916) 498-5710 Noa Oren@fd.org Attorney for Defendant ANGEL SANTIAGO RIVERA		
7			
8	IN THE UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10	UNITED STATES OF AMERICA,) Case No. 2:21-CR-00179-TLN		
11 12 13 14 15 16	Plaintiff, v. ANGEL SANTIAGO RIVERA Defendant. Plaintiff, STIPULATION AND ORDER TO CONTINUE STATUS CONFERENCE AND EXCLUDE TIME Date: July 14, 2022 Time: 9:30 a.m. Judge: Troy L. Nunley Date: July 14, 2022		
17	IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States		

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through James Conolly, Assistant United States Attorney and attorney for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender, Noa E. Oren, that the status conference for July 14, 2022 be continued to August 4, 2022 at 9:30 a.m.

The reason for this continuance is to allow defense counsel additional time to review, discovery, to continue investigating avenues for mitigation. The government has offered a plea in this case and defense counsel requires additional time to review the offer with her client.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from the date of the parties stipulation through and including August 4, 2022; pursuant to 18 U.S.C.§3161 (h)(7)(A)and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

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1	Counsel and the defendants also agree that the ends of justice served by the Court	
2	granting this continuance outweigh the best interests of the public and the defendants in a speedy	
3	trial.	
4		Respectfully submitted,
5	DATED: July 12, 2022	HEATHER E. WILLIAMS Federal Defender
6		
7		<u>/s/ Noa E. Oren</u> NOA E. OREN
8		Assistant Federal Defender Attorney for Defendant
9		ANGEL SANTIAGO RIVERA
10		
11	DATED: July 12, 2022	PHILLIP TALBERT United States Attorney
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13		/s/ James Conolly JAMES CONOLLY
14		Assistant United States Attorney Attorney for Plaintiff
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28	Stipulation and Order to Continue Status	-2- United States v. Santiago Rivera, 2:21-CR-179-

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing, adopts the stipulation in its entirety as its order. The Court specifically finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendants in a speedy trial.

The Court orders the status conference scheduled for July 14, 2022 be continued to August 4, 2022 at 9:30 a.m. The Court orders the time from the date of the parties stipulation, up to and including August 4, 2022, excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

DATED: July 12, 2022

Troy L. Nunley

United States District Judge